

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

WADITH STOCKINGER NADER and )  
STACEY NICHOLE NADER, )

Case No. 8:17-cv-00083

Plaintiffs, )

vs. )

AFFIDAVIT OF SCOTT A. LYONS

THE CITY OF PAPILLION; SARPY )  
COUNTY; BRYAN SVAJGL; BENJAMIN )  
IVERSEN; SCOTT A. LYONS; L. )  
KENNETH POLIKOV; and JENNIFER )  
MIRALLES, )

Defendants. )

STATE OF NEBRASKA )  
COUNTY OF SARPY ) SS.  
)

I, Scott A. Lyons, being first duly sworn deposes and states as follows:

1. I am a resident of Papillion, Nebraska and am more than 21 years of age. The facts stated herein are based upon my own personal knowledge and in the regular course of my duties as the Chief of Police with the Papillion, Nebraska Police Department. I am supplying this Affidavit in support of Defendants The City of Papillion, Bryan Svajgl, Benjamin Iversen and Scott A. Lyons' Motion for Summary Judgment.

2. I received my law enforcement certification in 1990.

3. Before becoming the Chief of Police for the City of Papillion, I was a police major for the Lee's Summit, Missouri Police Department

4. On March 2, 2015, I became the Chief of Police for the City of Papillion, Nebraska.

5. As the Chief of Police, I am familiar with the Papillion Police Department's policies, procedures, and processes employed by the Papillion Police Department for investigations, searches and seizures, interviews and interrogations, and arrests without a warrant.

6. As the Chief of Police, my duties include training and supervising Papillion Police officers in carrying out and acting according to the Papillion Police Department Policies.

7. I am also familiar with the training and career development tools offered to Papillion Police Department employees.

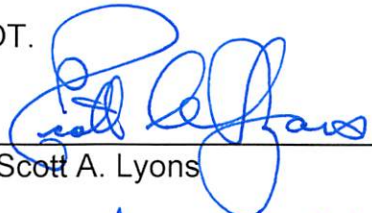
8. Attached as Exhibit "A" are true and accurate copies of the Papillion Police Department's policies for General Investigation Management, Search and Seizure, Interview and Interrogation, Arrest/ Citation in Lieu of Arrest, and Training and Career Development in effect at the times relevant to the present lawsuit.

9. I was not directly involved in the investigation of Plaintiff Wadith Nader ("Mr. Nader") leading up to his arrest on March 17, 2015.

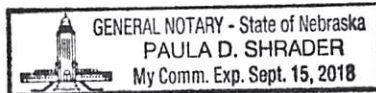
10. I was not present at Mr. Nader's residence on March 17, 2015, when the Papillion Police Department was executing a search warrant relating to the possession of suspected child pornography and Mr. Nader was arrested.

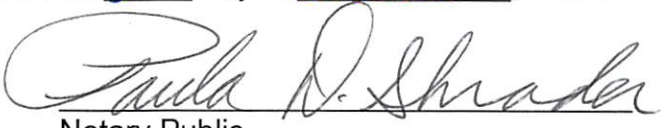
11. I have never had any discussions with Mr. Nader or his wife, Stacy Nichole Nader.

FURTHER AFFIANT SAYETH NOT.

  
\_\_\_\_\_  
Scott A. Lyons

Subscribed and sworn to before me this 2nd day of October, 2017.



  
\_\_\_\_\_  
Notary Public

My Commission Expires:

09/15/2018